

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREGORY PAPADOPOULOS,	:	CIVIL ACTION NO. 08CV00989
	:	
Plaintiff,	:	
	:	
V.	:	
	:	
TENET GOOD SAMARITAN INC.,	:	
	:	
	:	
Defendant.	:	AFFIDAVIT OF
	:	
	:	

STATE OF TEXAS)			
)	ss.		JUNE <u>4th</u> 2008
COUNTY OF DALLAS)			

I, Douglas E. Rabe, being duly sworn, hereby depose and say:

1. I am over the age of eighteen and understand the obligations of an oath.
2. I am the Vice President of the Defendant, Tenet Good Samaritan, Inc., dba Good Samaritan Medical Center ("Good Samaritan"). I have been an officer of Good Samaritan for 7 years.
3. I make this Affidavit freely, based on my personal knowledge of Good Samaritan's operations in support of Defendant's Motion to Dismiss the above-captioned action.
4. Good Samaritan is a corporation that is organized under the laws of the State of Florida, which operates a hospital in Florida. Good Samaritan is not organized under

the laws of the State of New York, nor does it operate any hospital in the State of New York.

5. The sole office and principal place of business of Good Samaritan is West Palm Beach, Florida.

6. Good Samaritan has never advertised within the State of New York, by mail or otherwise, nor has it solicited business from the State of New York.

7. Good Samaritan has never owned any real or personal property in the State of New York.

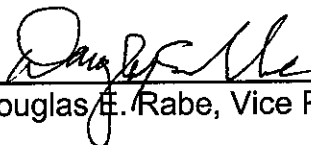
8. Good Samaritan has not entered into any contracts in the State of New York, nor has it ever entered into contracts to be performed in the State of New York.

9. Good Samaritan does not and has not produced, manufactured or distributed any good in the State of New York or elsewhere.

10. Good Samaritan has not engaged in any tortious conduct in the State of New York.

11. Good Samaritan does not and never has had agents, employees or representatives in the State of New York.

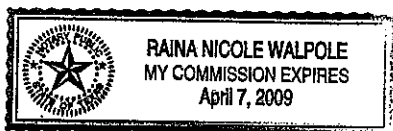
Dated this 4th day of June, 2008.



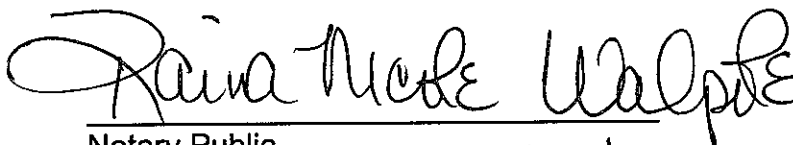
Douglas E. Rabe, Vice President

Notarization

Personally appeared Douglas E. Rabe, who being duly sworn subscribed to the truth of the statements contained herein.



[AFFIX SEAL]



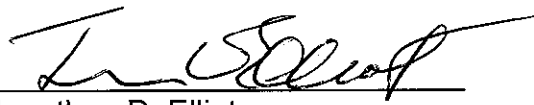
Notary Public
My Commission Expires: 4/7/09

CERTIFICATION

This is to certify that a copy of the foregoing has been sent via U.S. Mail first-class mail, postage prepaid, on this date, to:

Gregory Papadopoulos
800 5th Avenue, Apt. 14B
NYC, NY 10065

Dated at Bridgeport, Connecticut on this sixth day of June, 2008.


Jonathan D. Elliot